

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

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Attorney for Debtor Angelie Grimm

In Re:

Angelie Grimm

Case No.: 20-16393

Chapter: 13

Hearing Date: On Shortened Time Request

Judge: CMG

**SECOND AMENDED CERTIFICATION OF DEBTOR'S COUNSEL
IN SUPPORT OF DEBTOR'S MOTION TO APPROVE SALE OF
DEBTOR'S RESIDENTIAL PROPERTY AND FOR OTHER
ASSOCIATED RELIEF**

I, Marcia Y. Phillips, Esquire, counsel for Debtor Angelie Grimm, in the above captioned case, submits this Certification in support of the Motion to Approve a Sale Of Debtor's Residential Property.

1. As Debtor's Counsel, I am fully familiar with the facts herein.
2. Debtor filed this Chapter 13 case on 5/8/2020. The plan was confirmed on 10/8/2020. The deadline to file claims expired on 7/17/2020..
3. Debtor recently listed her property for sale through a realtor. The realtor is Jean Calvetto of Exit Reality Smart Move. On or about 2/10/2022, debtor

received an offer for a Sale Of Debtor's Residential Property. This contract was negotiated and modified on or about 2/16/2022. The final purchase price of the property is \$ 650,000 The closing date set for 3/30 or 3/31/2022. The contract of sale, various amendments thereto have been uploaded as exhibits to the original motion.

4. Debtor Angelie desires to sell her home, pay off the mortgage and pay off the outstanding debt associated with this Chapter 13 Bankruptcy.
5. The anticipated new closing date is ASAP, following this court's approval. The buyers are renting a home and their lease expires at the end of this month, March 31, 2022. The buyers do not wish to go elsewhere to live.
6. Debtor seeks to pay off all secured and any remaining debt under the plan, as evidenced from a payoff amount provided by the Chapter 13 Trustee, Albert Russo.
7. Approval of this Sale Of Debtor's Residential Property shall enable the debtor to restructure her financial affairs and pay off the majority of her creditors and complete the bankruptcy in short order. It is my understanding that the debtor is current with her car payment for the 2019 Chevy Trax via Americredit, which payments are outside of the chapter 13 plan.
8. Debtor is selling her home at the fair market value price and she has no relationship with the buyers.

Accordingly, this debtor seeks approval of the within motion and accompanying applications to retain professionals..

I certify under penalty of perjury that the above is true.

Date: 3-24-2022

/s/ Marcia Y. Phillips, Esquire